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June 24, 1997

Ms. Debra Rossi (3HW23)
Remedial Project Manager
U.S. Environmental Protection Agency, Region III
841 Chestnut Street
Philadelphia, Pennsylvania 19107-4431

Woodlawn Landfill Site Remedial Design/Remedial Action Administrative Order, EPA Docket No. III 95-05-OC Cecil County, Maryland

Dear Ms. Rossi:

As you requested on June 17, 1997, this letter is to provide supplemental information regarding the following:

- 1. additional information to allow a more direct comparison of published leachate indicator data (such as TOC, BOD, and COD) for landfills to the reported concentrations of these indicators in groundwater at the Woodlawn site.
- 2. tables summarizing analytical results for all groundwater samples collected in February and March 1997.
- 3. a comprehensive summary of results for all groundwater samples collected in February and March 1997 that were analyzed for polynuclear aromatic hydrocarbons (PAHs) and pentachlorophenol using methods that afford lower detection limits.
- 4. vinyl chloride and analytical holding times.

At this time, we have not completed efforts to develop additional data that provides a more direct comparison of leachate indicator data (Item 1 above). Once the efforts to acquire additional information are complete, we will provide the additional information to USEPA. At this time, we have not completed efforts to develop additional data that provides a more direct comparison of leachate indicator data (Item 1 above). Once the efforts to acquire additional information are complete, we will provide additional information to USEPA. As we understand it, the essential question regarding

this issue is: "How much would leachate from the landfill be diluted in groundwater, as compared to leachate exuding directly from waste material"? Unfortunately, there is no readily available data upon which to make this determination; however, the groundwater data from Woodlawn provides insight if viewed in the context of data from residential wells surrounding the landfill. Generally, the concentration of landfill leachate indicator parameters are not significantly higher in the most heavily-affected wells on site compared to surrounding residential wells. These empirical data demonstrate that the leachate generation rate at Woodlawn is not significantly greater than the assimilative capacity of the biogeochemical ecosystem surrounding the landfill.

Tables summarizing preliminary analytical results for the February-March 1997 groundwater samples (Item 2 above) were previously provided to USEPA in the June 3, 1997 Technical Memorandum (see Attachment D of the June 3, 1997 response to USEPA comments on the predesign). The validated data reports for these samples were included in the May 1997 progress report submitted to USEPA. A partial summary (natural attenuation monitoring wells only) of PAH and PCP analytical results for groundwater samples collected in February and March 1997 was previously provided to USEPA in the June 3, 1997 Technical Memorandum (Item 3). A comprehensive summary of PAH and PCP analytical results for these samples is provided in the attached Table 1. The topic of vinyl chloride concentrations and analytical holding times (Item 4) is thoroughly discussed herein.

VINYL CHLORIDE AND ANALYTICAL METHODOLOGY

As documented, a significant reduction in the concentration, extent and mass of vinyl chloride has been observed at the Woodlawn Landfill site. Historical groundwater sampling data collected since 1982 at the site indicates that the concentrations of dissolved vinyl chloride in individual monitoring wells has markedly declined since 1987. Typical reductions in concentration are, for example, 74 percent in well F-5, 96 percent in well F-6, 99 percent in well F-7, and 77 percent in well F-10.

A careful evaluation of biogeochemical data recently collected at the site has led to the demarcation of three zones of biogeochemical activity: an anaerobic-reducing zone; a more oxidizing, or transitional zone; and an aerobic zone. The observed vinyl chloride mass reduction is a result of the cumulative effects of the oxidation of vinyl chloride via predominantly anaerobic mechanisms in the interior portions of the plume, a combination of anaerobic and aerobic mechanisms in the transition zone, followed by the rapid oxidation of vinyl chloride by dissolved oxygen in the aerobic zones present at the outer edges of the plume.

USEPA has inquired about information on historical sample holding times and vinyl chloride concentrations in groundwater samples collected at the Woodlawn site. Apparently USEPA's inquiry is in reaction to a study that reports potential losses of vinyl

chloride that may occur within the USEPA-mandated 14-day analytical holding time for preserved water samples. Therefore, this letter addresses the potential losses of vinyl chloride that may occur within the 14-day analytical holding time, and whether that could reasonably be a factor in the observed historical reduction of vinyl chloride in groundwater that has been documented at the site. Our conclusion is that any potential losses of vinyl chloride that could be related to analytical holding times are not significant and are far exceeded by the observed declining trends and reduced extent and mass of vinyl chloride in groundwater at the Woodlawn site. Furthermore, the uniform logarithmic decline rate in vinyl chloride concentrations in many wells is characteristic of natural attenuation, and could not have been reproduced by somewhat random variations in laboratory holding times.

GENERAL OVERVIEW

In response to USEPA's inquiry about analytical holding time, Geraghty & Miller acquired two published studies that speak to the issue but draw opposite conclusions. The first study was published by the Minnesota Department of Health (MDH) and concluded there are measurable losses of vinyl chloride within analytical holding times (Soule, et al., 1996). The second study was published in the American Environmental Laboratory and found that holding times could actually be increased from 14 days to 28 days for the analysis of volatile organics in water samples because of no percent change in vinyl chloride concentration was measured after a holding time of 28 days in either a 20 part per billion spiked sample or a 200 part per billion spiked sample (West, et al., 1997).

In 1996, the MDH published a study on vinyl chloride loss during laboratory holding time (Soule, et al., 1996). This study investigated the current holding time of 14 days to determine if vinyl chloride is lost during this time. The focus of the study was on samples that contained very low initial concentrations, 2 micrograms per liter (ug/L) and less, of vinyl chloride. The study reported 30 percent losses of vinyl chloride in these low concentrated samples; with 25 percent of the losses occurring within the first 2 days. Also, this study recognized the variability that is inherent in reported results for vinyl chloride at low concentrations.

The American Environmental Laboratory, April 1997 edition, published a study that contradicts the conclusions of the MDH study. One distinction between the two studies is that the MDH study focused on low concentrations of vinyl chloride, whereas, the latter study focused on holding time effects in samples with concentrations on the order of 20 ug/L and 200 ug/L. The American Environmental Laboratory found the scientific basis for actually increasing holding times from 14 days to 28 days for the analysis of volatile organics in water samples. The study concludes that a 28 day holding time would not jeopardize the measurement of volatile organics in water samples. In that study, no percent change in vinyl chloride concentration was measured after a holding

time of 28 days in either a 20 part per billion spiked sample or a 200 part per billion spiked sample (West, et al., 1997).

Furthermore, it is important to view the reported losses attributed to holding times in the context of the inherent variability in the analytical methodology. Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846) provides the USEPA approved methods for obtaining data to satisfy requirements of 40 CFR Parts 122 through 270 and presents the accepted standard routine analytical methodology. In SW-846, the published calibration and quality control acceptance criteria for USEPA Method 8240B for volatile organics reports a range for percent recovery measured from detection to 251 percent for vinyl chloride. This wide range in percent recovery measured was derived assuming a sample vinyl chloride concentration of 20 ug/L and is based on actual method performance data. Therefore, the inherent variability reflected in the calibration and QC acceptance criteria for the approved analytical methodology far outweighs any potential losses that may be attributed to holding times.

SITE SPECIFIC DATA

As requested by USEPA, provided in Table A and B below are summaries of the vinyl chloride concentration and holding time data for wells F-5, F-6, F-7, and F-10 for samples collected in March 1990 and in March 1996. Data for wells F-5, F-6, F-7, and F-10 have been provided because these historical data have been repeatedly presented to USEPA as best illustrating the declining vinyl chloride concentration trends in groundwater at the site. The trends for vinyl chloride in these wells are shown on Figures 1A through 1D.

Table A. Vinyl Chloride and Holding Times 1990

Date Sampled	Date Analyzed	- Holding Time	Vinyl Chloride
-		(Days)	Concentration
			(ug/L)
3/14/90	3/20/90	6	110
3/14/90	3/20/90	6	520
3/13/90	3/15/90	2	57
3/12/90	3/15/90	2	27
	3/14/90 3/14/90	3/14/90 3/20/90 3/14/90 3/20/90 3/13/90 3/15/90	(Days) 3/14/90 3/20/90 6 3/14/90 3/20/90 6 3/13/90 3/15/90 2

* Sample/analysis control documents prepared by IT indicate samples may not have been preserved with hydrochloric acid.

Table B. Vinyl Chloride and Holding Times 1996

Well Identification	Date Sampled	Date Analyzed	Holding Time (Days)	Vinyl Chloride Concentration (ug/L)
F-5	3/14/96	3/25/96	11	(ug/L)
F-6.	3/14/96	3/20/96	6	110
F-7	3/12/96 -	3/26/96	14	1.2
F-10	3/11/96	3/23/96	12	13.

All samples were preserved with hydrochloric acid to inhibit sample degradation.

All samples presented in Tables A and B were analyzed within the USEPA mandated 14-day holding time for volatile organic analyses of preserved water samples; therefore all analytical results are valid and defensible. Three samples (F-5, F-7, and F-10) that were analyzed in March 1990 have a relatively shorter holding time than samples analyzed in 1996. A likely explanation for the shorter holding times for the March 1990 samples is that sample/analysis control documents prepared by IT indicate these samples may not have been preserved with hydrochloric acid. Therefore, the laboratory may have hastened the analyses of these nonpreserved samples to preclude possible in-sample biodegradation of vinyl chloride. The preservation of water samples using hydrochloric acid is a normal procedure employed to inhibit possible sample degradation. Thus, it's plausible that the March 1990 samples could have degraded, while awaiting analysis, more than the March 1996 samples. The March 1990 concentrations could be biased low; so, the percent reduction between the two events could be greater than is evident. This illustrates a few of the many variables that need to be accounted for in any field study to isolate possible effects on analytical results related to hold time.

Samples collected from Well F-6 in March 1990 and March 1996 were both analyzed six days after sample collection. These results indicate approximately 80 percent reduction in vinyl chloride concentrations between these two sample events. Given that these samples were analyzed within the same holding time period and that the March 1996 sample was preserved whereas, the March 1990 sample was not, these data empirically demonstrate that potential losses related to analytical holding times are not a factor in the observed reduction in vinyl chloride. Regardless for reasons cited above, any losses that may occur within USEPA mandated holding times are insignificant and certainly do not factor in the documented declining trends, reduced areal extent and mass of vinyl chloride in groundwater at the Woodlawn Site.

SUMMARY

A preponderance of empirical data demonstrate a significant reduction in concentration, aereal extent, and mass of vinyl chloride at the Woodlawn site. Historical biogeochemical data and the more recent biogeochemical data, collected following USEPA sampling and analytical protocols for evaluating natural attenuation of chlorinated solvents in groundwater, have confirmed natural degradation mechanisms as a predominant reason for the observed reductions. The MDH study which has been published relating possible losses of vinyl chloride to analytical holding times does not lead to a concern that these possible losses are a significant factor in the observed declining concentration trends and reductions of vinyl chloride in groundwater at the Woodlawn site. This conclusion is based on the following:

- 1. The focus of the aforementioned study was on samples with very low (1.5 and 2 ug/L) initial concentrations of vinyl chloride. The declining trends and reductions of vinyl chloride observed at the Woodlawn site involve concentrations of vinyl chloride that were once orders of magnitude higher than those in that study. The historical concentrations have shown an initial rise to a peak followed by a declining trend with time that is predictable and consistent with the knowledge and understanding of natural attenuation mechanisms and site characteristics (see Figures 1A through 1D).
- 2. Other related studies have concluded there is sufficient scientific basis for increasing holding times from 14 days to 28 days for the analysis of volatile organics in water samples. In one such study, no percent change in vinyl chloride concentration was measured after a holding time of 28 days in either a 20 part per billion spiked sample or a 200 part per billion spiked sample (West, et al., 1997).
- 3. Potential losses attributed to holding times must be considered in the context of the inherent variability of the analytical methodology. In SW-846, the published calibration and quality control acceptance criteria for USEPA Method 8240B for volatile organics reports a range for percent recovery measured from detection to 251 percent for vinyl chloride. The inherent variability reflected in the calibration and QC acceptance criteria for the approved analytical methodology far outweighs any potential losses that may be attributed to holding times.
- 4. The magnitude of observed reductions in vinyl chloride between the March 1990 and March 1996 sampling events far exceed any possible losses that

could theoretically be attributed to differences between sample holding times. In fact, samples collected from Well F-6 in March 1990 and March 1996 were both analyzed six days after sample collection. Given that these samples were analyzed within the same holding time period and that the March 1996 sample was preserved whereas, the March 1990 sample was not, these data empirically demonstrate that potential losses related to analytical holding times are not a factor in the observed reduction (in this case 80 percent or more) in vinyl chloride.

As demonstrated herein, any potential losses of vinyl chloride that could be related to analytical holding times are indistinguishable from other sampling and analysis variables; not significant and are far exceeded by the observed declining trends and reduced extent and mass of vinyl chloride due to natural attenuation at the Woodlawn site; and are not significant in the context of the goals and objectives nor the interpretation of groundwater analytical results at the Woodlawn site.

We hope that the information and discussion that we have provided herein sufficiently respond to your requests and we look forward to hearing from you shortly regarding USEPA's decision regarding the groundwater remedy at the Woodlawn site. If you have any questions or should you require additional information, please call.

Sincerely,

GERAGHTY & MILLER, INC.

Jeffrey A. Smith Project Manager

Suthan S. Suthersan, Ph.D., P.E.

Project Officer

c: Tim Bent, Bridgestone/Firestone

Figures

- Figure 1A. Declining Trends for Vinyl Chloride Versus Sodium in F-5, Woodlawn Landfill, Cecil County, Maryland.
- Figure 1B. Declining Trends for Vinyl Chloride Versus Sodium in F-6, Woodlawn Landfill, Cecil County, Maryland.
- Figure 1C. Declining Trends for Vinyl Chloride Versus Sodium in F-7, Woodlawn Landfill, Cecil County, Maryland.
- Figure 1D. Declining Trends for Vinyl Chloride Versus Sodium in F-10, Woodlawn Landfill, Cecil County, Maryland.

Attachments

Table 1 Summary of Validated Analytical Results for Groundwater Samples Collected from Monitoring Wells on February 26 through March 10, 1997, Woodlawn Landfill, Cecil County, Maryland.

REFERENCES

- USEPA-SW-846, 1986, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846), Revision 2, September 1994.
- Soule, R. et al., 1996. Vinyl Chloride Loss During Laboratory Holding Time, Regulatory Toxicology and Pharmacology 23, pp. 209-212.
- West, O.R. et al., 1997. A Scientific Basis for Revising Regulatory Holding Times for VOC Water Samples. American Environmental Laboratory, April 1997.

Summary of Validated Analytical Results for Groundwater Samples Collected from Monitoring Wells on February 26 through March 10, 1997, Woodlawn Landfill, Cecil County, Maryland.

Location ID	B-2	B-3	B-4	B-5	В-6	F-1	F-10	F-2	F-2	F-3
SAMPDATE	3/4/97	3/5/97	3/5/97	3/6/97	3/6/97	2/27/97	3/7/97	3/10/97	DUP 3/10/97	3/6/97
*										
Benzo(A)Anthracene	.008 UL	.008 U	.008 UL	.008 UL	.008 U	.008 U	.008 UL	.008 U	0.07	.008 U
Benzo(A)Pyrene	.004 UL	.004 U	.004 UL	.004 UL	.004 U	.004 U	.004 UL	.004 U	0.08	.004 U
18 Benzo(B)Fluoranthene	.006 UL	.006 U	.006 UL	1006 UL	.006 U	J. 800.	.006 UL	.010 J	0.1	.006 U
Benzo(K)Fluoranthene	.002 UL	.002 U	.002 UL	.002 UL	.002 U	.002 U	.002 UL	,007 J	0.1	.002 U
Chrysene	.04 UL	.04 U	.04 UL	.04 UL	.04 U	.04 U	.04 UL	.04 U	. 09 J	.04 U
Pentachlorophenol	.005 UL	.005 U	.005 U	.005 UL	.03 U	.005 U	03 UI	.03 U	0311	1150

AR309666

Field duplicate sample. Compound was analyzed for but not detected, method detection limit reported. The associated numerical value is an estimate. The associated numerical value is an estimated quanity, possibly biased low.

Table 1. Summary of Validated Analytical Results for Groundwater Samples Collected from Monitoring Wells on February 27 through March 10, 1997, Woodlawn Landfill, Cecil County, Maryland.

									-	•
Location ID	F-5	F-6.	F-8	F-9	ITB-1	ІТВ-2	ITB-3	ITB-4	ITB-4	ITB-5
SAMPDATE	3/6/97	3/10/97	3/10/97	3/7/97	3/7/97	3/5/97	3/6/97	3/6/97	DUP 3/6/97	3/6/97
Benzo(A)Anthracene	.008 U	.008 U	.008 U	.008 UL	.008 UL	.008 U	.008 UL	.008 UL	JU 800.	.008 U
ວຣ Benzo(A)Pyrene	.004 U	.004 U	.004 U	.004 UL	004 UL	.004 U	.004 UL	_004.UL	004 UL	:004 U
Benzo(B)Fluoranthene	.006 U	U 900.	.006 U	.006 UL	.006 UL	.006 U	.006 UL	.006 UL	.006 UL	.006 U
Benzo(K)Fluoranthene	.002 U	.002 U	.002 U	.002 UL	.002 UL	.002 U	.002 UL	.002 UL	.002 UL	.002 U
Chrysene	.04 U	.04 U	.04 U	.04 UL	.04 UL	.04 U	.04 UL	.04 UL	.04 UL	.04 U
\ Pentachlorophenol	.03 U	.03 U	.005 U	.03 UL	.03 UL	.005 U	.005 UL	.005 R	.03 UL	.03 U

4R309667

U Compound was analyzed for but not detected, method detection limit reported.

The associated numerical value is an estimated quanity, possibly biased low.

The associated numerical value is an estimate.

Summary of Validated Analytical Results for Groundwater Samples Collected from Monitoring Wells on February 27 through March 10, 1997, Woodlawn Landfill, Cecil County, Maryland.

Location ID	ITB-6	ITP-1	DI IP	ITP-2	ITP-3	ITS-1	MW-101A	MW-101B	MW-102A	MW-103A
SAMPDATE	3/6/97	3/7/97	3/7/97	2/28/97	2/27/97	2/28/97	3/7/97	3/10/97	2/28/97	3/5/97
b-13 Benzo(A)Anthracene o-12 Benzo(A)Pyrene O-13 Benzo(B)Fluoranthene O-15 Benzo(K)Fluoranthene Chrysene Pentachlorophenol	.008 U .004 U .006 U .002 U .04 U	.008 UL .004 UL .006 UL .002 UL .002 UL	.008 UL .004 UL .006 UL .002 UL .04 UL	0.02 .004 U .006 U .002 U .04 U	.008 U .004 U .006 U .002 U .04 U	.008 U .004 U .006 U .002 U	.008 UL .004 UL .006 UL .002 UL .04 UL	.008 U .004 U .006 U .002 U	.008 U .004 U .006 U .002 U	.008 UL .004 UL .006 UL .002 UL .04 UL

AR309668

The associated numerical value is an estimate. Compound was analyzed for but not detected, method detection limit reported. The associated numerical value is an estimated quanity, possibly biased low.

Field duplicate sample.

Location ID	MW-104A	MW-105A	MW-105B	MW-106A	MW-106B	MW-107A	MW-108A	MW-108B	MW-109A	MW-109B
SAMPDATE	2/26/97	3/5/97	3/7/97	3/4/97	3/5/97	2/26/97	2/27/97	3/4/97	3/4/97	3/4/97
	-				-		-			
Benzo(A)Anthracene	.008 U	.008 U	.008 UL	.008 U	.008 ∪	.008 U	.008 U	U 800.	.008 U	.008 U
() () Benzo(A)Pyrene	.004 U	.004 U	.004 UL	.004 U	.004 U	.004 U	,004 U	,004 U	.004 U	.004 U
(a) Benzo(B)Fluoranthene	.014 B	'006 U	.008 UL	.006 U	.021 J	.006 L				
Benzo(K)Fluoranthene	.002 U	.002 U	.002 UL	.002 U						
Chrysene	.04 U	.04 U	.04 [.] UL	.04 ∪	.04 U					
Pentachlorophenol	.005 U	.005 U	.005 UL	.016 J	_005 U	.005 U	.005 U	005 U	.005 U	.005 U

U Compound was analyzed for but not detected, method detection limit reported.

F1.07

The associated numerical value is an estimated quanity, possibly biased low.

J The associated numerical value is an estimate.

IP Field duplicate sample.

Page 5 of 6

Summary of Validated Analytical Results for Groundwater Samples Collected from Monitoring Wells on February 27 through March 10, 1997, Woodlawn Landfill, Cecil County, Maryland.

Location ID SAMPDATE	MW-109B DUP 3/4/97	OW-1 3/3/97	OW-2 3/3/97	OW-4 2/27/97	SW-1 2/26/97	SW-1 DUP 2/26/97	TSTA-1 3/4/97	WW-1 2/28/97
Benzo(A)Anthracene 5 (3 Benzo(A)Pyrene 6 (7 Benzo(B)Fluoranthene 6 (7 Benzo(K)Fluoranthene 7 (2 Chrysene 7 Pentachlorophenol	.008 U .004 U .006 U .002 U .04 U .005 U	.008 U .004 U .006 U .002 U .04 U	.008 U .004 U .006 U .002 U .04 U .005 U	.008 U .004 U .006 U .002 U .04 U	.008 U .004 U .006 U .002 U .04 U	.008 U .004 U .006 U .002 U .04 U .005 U	.008 U .004 U .006 U .002 U .04 U	.008 UL .004 UL .006 UL .002 UL .04 UL

AR30**967**0

Compound was analyzed for but not detected, method detection limit reported.

The associated numerical value is an estimated quanity, possibly biased low.

The associated numerical value is an estimate.

Field duplicate sample.

Location ID	FB-1	FB-21	FB-31	FB-41	FB-51	FB-61	FB-7'	FB-8	FB-91
SAMPDATE	2/26/97	2/27/97	2/28/97	3/3/97	3/4/97	3/5/97	3/6/97	3/7/97	3/10/97
									200
Benzo(A)Anthracene	.008 J	.008 U	.008 U	.00 8 U	.008 U	.015 J	.008 U	.008 UL	U 800.
Benzo(A)Pyrene	J. 600°	.004 U	.004 U	.004 U	.004 U	.029 J	.004 U	.004 UL	.004 U
Benzo(B)Fluoranthene	.006 U	.006 U	.006 U	.006 U	.006 U	.035 J	.006 U	.006 UL	.006 U
Benzo(K)Fluoranthene	.012 J	.002 U	ຸ່ 200.	.002 U	.002 U	.019 J	.002 U	.002 UL	.002 U
Chrysene	.04 U	.04 U	.04 ∪	.04 U	.04 U	.05 J	.04 U	.04 UL	.04 U
Dantachlaranhanal	.005 U	.005 U	.005 U	.005 U	.005 U	.006 J	.005 U	.005 UL	.005 U

Compound was analyzed for but not detected, method detection limit reported.

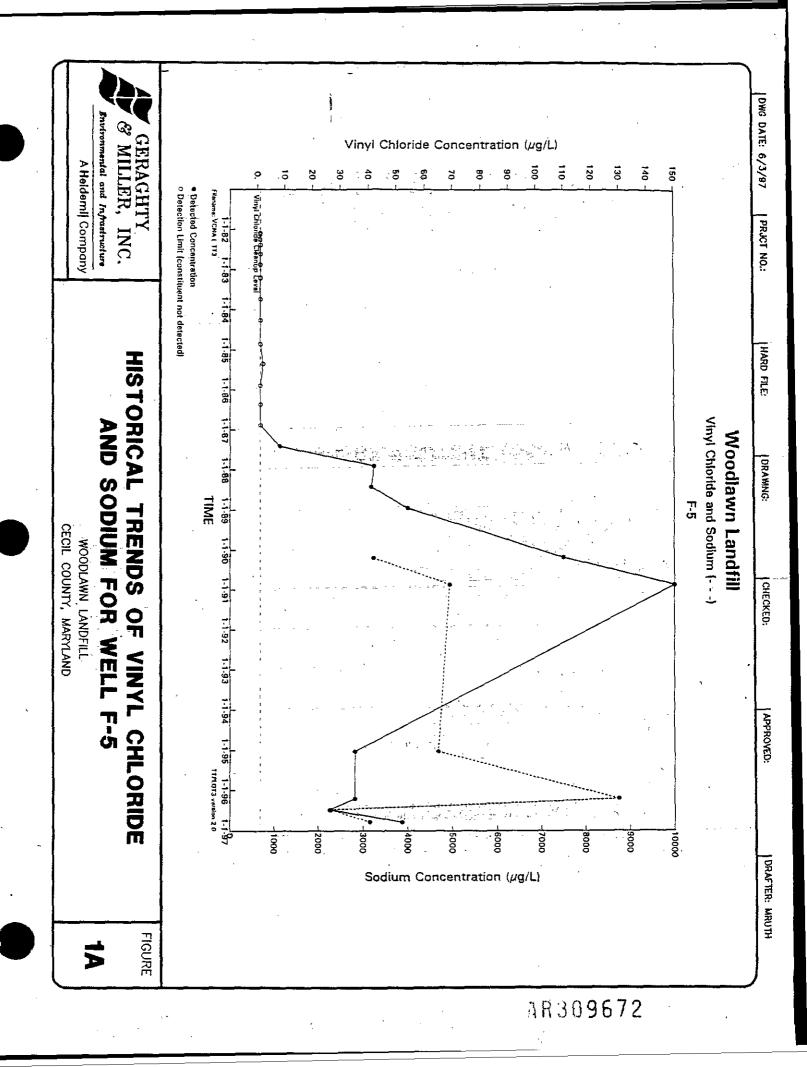
Field rinsate blank sample.

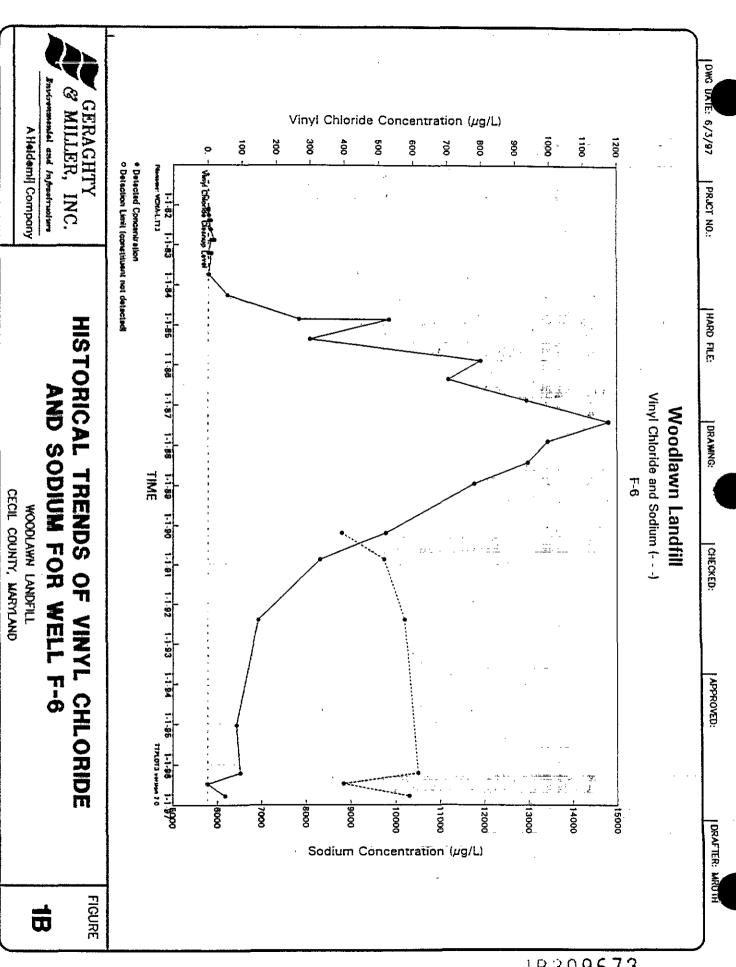
GERAGHTY & MILLER, INC.

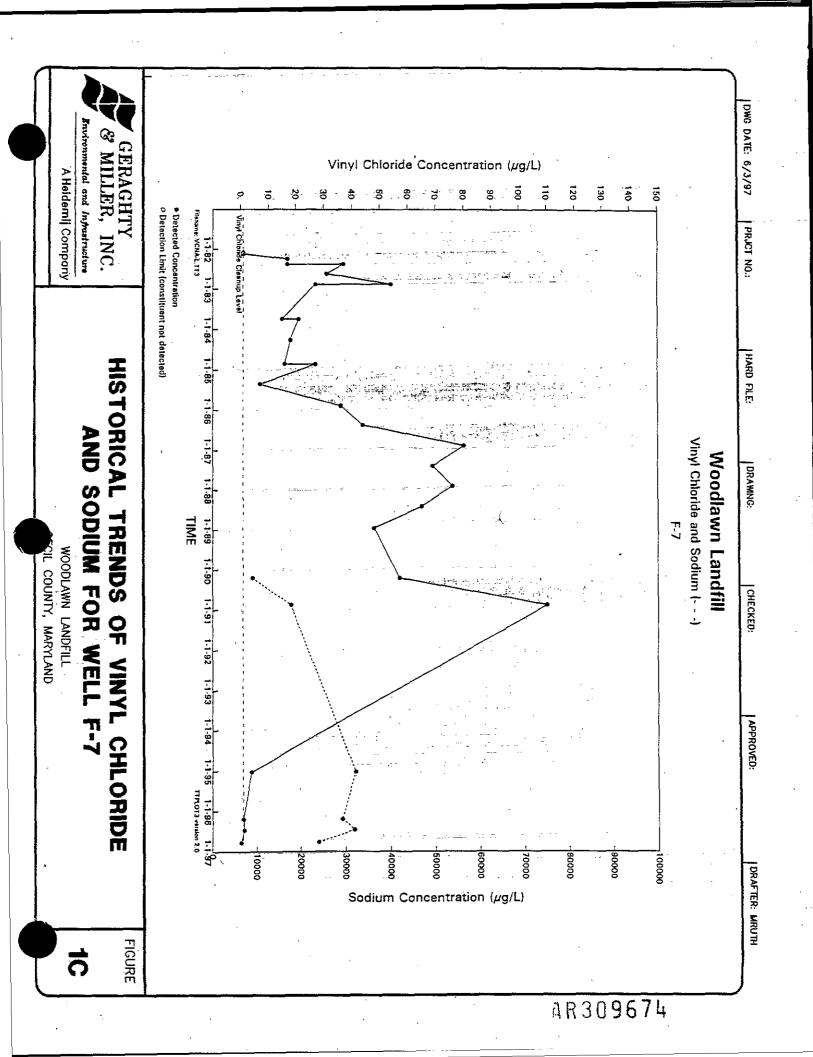
The associated numerical value is an estimated quanity, possibly biased low.

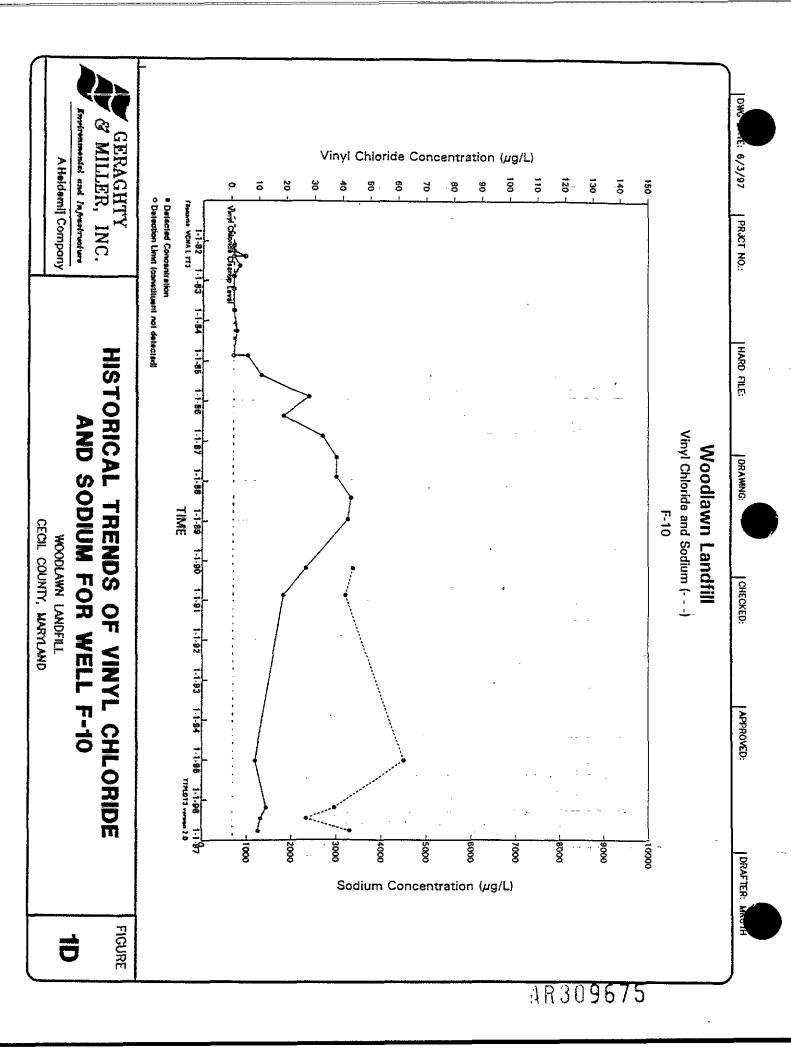
The associated numerical value is an estimate.

P Field duplicate sample.









Vinyl Chloride Loss during Laboratory Holding Time

RICHARD SOULE, DANIEL SYMONIK, DAVID JONES, DOUG TURGEON, AND BETSY GERBEC

Minnesota Department of Health, 121 E. 7th Place, St. Paul, Minnesota 55101

Received February 8, 1996

Because vinyl chloride is a potent human carcinogen, it is important that analytical results from groundwater samples accurately reflect levels of exposure to groundwater users. This study investigated the current allowable holding time of 14 days to determine if vinyl chloride is lost from samples during this time. Samples containing an initial concentration of 2 µg/ liter of vinyl chloride showed progressive, increasing losses when held for 1, 2, 7, and 14 days. Due to the inherent variability of low-level laboratory results, the most statistically significant loss ($\alpha = 0.05$) was seen for samples held for 14 days. No statistically significant differences in degradation pattern were noted between analytical detectors used (PID versus Hall) or sample type (lab versus field). There also was a loss of vinyl chloride observed during sample collection and handling. These results suggest that analytical variability at low concentrations and the establishment of health-based guidelines near the analytical detection limit require multiple samples be collected from a single location when highly accurate results are needed. These findings should be considered in public health exposure assessments and the implementation of health-based recommendations at sites with vinyl chloride groundwater contamination. D 1996 Academic Press. Inc.

INTRODUCTION

Vinyl chloride is a potent human carcinogen and a common groundwater contaminant near hazardous waste sites. The guidelines for drinking water supplies containing vinyl chloride in Minnesota (USEPA, 1993; MDH, 1994) are nearly equivalent to typically reported analytical detection limits (ATSDR, 1993). Vinyl chloride has been found at 458 of the 1300 federal Superfund sites (ATSDR, 1993) and is commonly identified at levels above its regulatory guidelines. Efforts to 1986). All samples were preserved with a biocide, adprotect users of aquifers contaminated by vinyl chloride

rely on analytical results to estimate human exposure. This makes it important to confidently determine that analytical results accurately reflect levels of vinyl chloride exposure.

The U.S. Environmental Protection Agency (USEPA) recommends that preserved water samples tested for vinyl chloride be analyzed within 14 days of collection (USEPA, 1988). In our experience, water samples analyzed immediately after collection seemed consistently higher than similar samples that were held for longer periods. This raised the concern that samples which are held for even a small portion of the holding time may underestimate both the vinyl chloride concentration and the potential human exposure. This, in turn, could result in an underestimation of the health threat to users of contaminated groundwater. The objective of this study was to determine if a significant amount of vinyl chloride was lost from water samples during the 14-day holding period.

METHODS

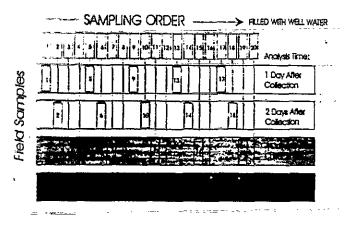
Two types of water samples were tested: laboratoryprepared water containing a known concentration of vinyl chloride ("lab samples") and groundwater samples collected from a single well ("field samples"). As an extraction well for a groundwater treatment system, this well is pumped continuously and has historically yielded groundwater consistently containing low part per billion levels of vinyl chloride. The concentration in the lab samples was chosen to be similar to those recently found in the well (1.5 µg/liter).

As shown in Fig. 1, three replicates of 20 field samples and 20 lab samples were collected in clean 40-ml glass vials with Teflon-lined septa. Samples within a replicate were numbered corresponding to their order of filling. Sampling procedures followed the techniques typically used in environmental investigations (MPCA, justed to pH less than 2, and immediately refrigerated at 4°C until testing.

Both the field and lab samples were systematically assigned to four different holding time groups. Groups of five field samples and five lab samples each were

¹ To whom correspondence should be addressed.

² Currently at Colorado Department of Health, Disease Control and Environmental Epidemiology.



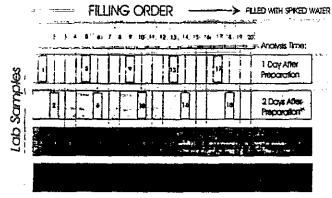


FIG. 1. Sampling procedure.

analyzed at 1, 2, 7, and 14 days after collection (Fig. 1). Laboratory internal control samples consisted of laboratory standards and spiked samples. Blank and matrix spike data did not show sample contamination or a significant matrix effect on instrument performance.

Each sample was analyzed for vinyl chloride using both a photoionization detector (PID) and a Hall detector (Hall). Data from each detector were reported and compared separately using Student's t test. A Tracor 540 gas chromatograph was used along with a Tekmar TURBOcool option and EPA method 502.2 (USEPA, 1989). Chromatographic conditions were Restek Corp. 105-m \times 0.53-mm-i.d. column with 3- μ m film, trap temperature during purge at -20° C, trap packing Supelco Vocarb 3000, and purge time of 3 min; column program was initially at 40°C for 10 min, then 10°C per minute to 200°C, and held for 5 min.

RESULTS

The percentage loss of vinyl chloride for the lab and field samples versus holding time is plotted in Fig. 2. Data from replicates were combined to yield a data set of 15 samples (n = 15) for each detector and sample holding time group. Approximately 40% of the vinyl

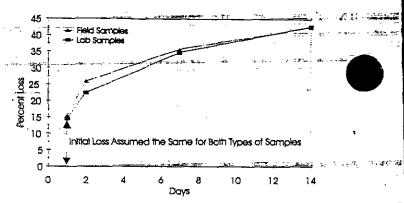


FIG. 2. Percentage loss over holding time.

chloride initially present was lost over the entire 14-day holding time, with roughly half (25%) of the loss occurring in the first 2 days. The decrease in vinyl chloride concentrations observed is statistically significant ($\alpha=0.05$). The same trend of vinyl chloride loss was observed for both types of analytical detector.

The standard deviations of the combined results ranged from 0.02 to 0.17 μ g/liter for the lab samples and from 0.07 to 0.29 μ g/liter for the field samples. Daily standards prepared in the lab showed similar variability, suggesting that most of the variability was a result of the analytical methods (rather than a result of sample handling). This high degree of relative variability is common for vinyl chloride samples analyzed in this range and may raise concerns about the reliability of using a single sample to make public health determinations.

Figure 3 shows an analysis of concentration versus filling order. The major cyclical trend is due to the varying holding times for sequential sample bottle numbers. The figure suggests that there may be two other types of vinyl chloride loss occurring during the holding

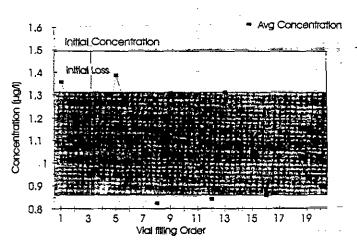


FIG. 3. Types of losses.

time: (a) an initial loss of about 0.22 ug/liter (15%) that affects the results from all sample vials, regardless of origin or detector; and (b) a progressively increasing handling loss of up to 0.15 μ g/liter (10%) which is shown by the regression line. The initial loss could only be determined using laboratory samples where the initial concentration is known (prepared spike). This portion of the loss may be laboratory related, such as measurement error, handling or headspace loss, or a factor common to all samples such as binding to glass, photodegradation, or loss through the septa. The handling loss is likely a result of increasing duration of sample exposure to air with increasing sample number (e.g., water in vial 20 was exposed to air longer and showed a greater loss than water in vial 1 since each was poured from the same supply).

DISCUSSION

Health-based standards for vinyl chloride are very low because it is rated as a Class A carcinogen with a relatively high estimated oral cancer slope factor of 1.9 (mg/kg/day)⁻¹ (USEPA, 1994). The U.S. EPA Maximum Contaminant Level, which is the value used for vinyl chloride in municipal water supply systems, is 2 μ g/ liter (based on the analytical detection limit; USEPA, 1993). The Minnesota Department of Health (MDH) has established a health-based guideline for private drinking water supplies of $0.2 \mu g/liter$ (based on cancer potency slope and a 10⁻⁵ risk; MDH, 1994). These standards are roughly equivalent to reported analytical detection limits in water (ATSDR, 1993). Due to the decrease in precision which occurs as concentrations approach the detection limit, accurate estimates of ambient water concentrations from a single sample are more difficult to obtain at lower concentrations.

The physicochemical characteristics of vinyl chloride and its environmental fate may eliminate several possible explanations for the observed loss. Although vinyl chloride has a very high saturation vapor pressure (2530 mm Hg at 20°C) and is subject to partitioning into an air head space [Henry's Law Constant of 1.2 (atm-m³)/mol at 10°C], all samples were thoroughly checked to ensure that any air bubbles were removed. Although under certain circumstances vinyl chloride readily biodegrades (ATSDR, 1993), this pathway seems unlikely given that all samples were acidified and treated with biocide. The samples were kept in a darkened refrigerator to minimize photochemical degradation (EPA, 1986). Sorption of some organic chemicals onto the materials of sample containers has been observed (Bradbury et al., 1987), but the low octanolwater partitioning coefficient (log $K_{ow} = 1.36$) for vinyl chloride indicates that this would be negligible for the concentrations used in this study (per equation 5.8.4 in Manahan, 1994).

The most common source of vinyl chloride in ground-

water at hazardous waste sites is the anaerobic dehalogenation of 1,1,2-trichloroethene, tetrachloroethene, and 1,1,1-trichloroethane (ATSDR, 1993). Therefore, it can be present in groundwater at sites where pure vinyl chloride was not used or disposed and may be overlooked when developing a list of contaminants of concern. In addition, if an analytical technique is used which has a detection limit above 2 μ g/liter, a significant complete exposure pathway may be missed and potential risks from a site underestimated.

Since significant public health actions, such as imposing drinking water restrictions or installing expensive treatment/removal systems, often hinge on limited analytical results, it is crucial to obtain the most accurate and precise measurements possible. For vinyl chloride, this can be accomplished by collecting more than one sample from a well, taking care to ensure that sample contact with the air is minimized, and using sufficiently sensitive analytical techniques. It is important for both risk assessors and risk managers to recognize the uncertainties in sample collection and analysis when dealing with analytical data from groundwater drinking water supplies potentially contaminated with vinyl chloride.

CONCLUSIONS

A statistically significant amount of vinyl chloride was lost from water samples between the time of collection and analysis. This loss increased to 40% of the initial concentration when held for 14 days prior to analysis. Therefore, immediate testing of samples is warranted where low part per billion concentrations of vinyl chloride may be present in drinking water (e.g., when concentrations may be near health-based standards). Moreover, the results of immediate analyses are more representative of actual exposure concentrations than those from samples held for longer times.

In addition to loss during holding time, this study suggests that there may be significant loss of vinyl chloride due to the sampling and handling processes. Therefore, sampling and analysis techniques should be reviewed to minimize sample exposure to the air.

Due to analytical variability at low concentrations, collection and analysis of multiple water samples from a single location are also warranted when highly accurate results are needed (e.g., when sample concentrations are near health-based guidelines or the analytical detection limit)

Since significant public health actions, such as imposing drinking water restrictions or installing expensive treatment/removal systems, often hinge on limited analytical results, it is crucial to obtain the most accurate and precise measurements possible. Both risk assessors and managers need to be aware of the uncertainty associated with reported vinyl chloride results in

order to make informed and appropriate public health decisions.

Although vinvl chloride was lost from samples, this study does not identify the mechanism of the loss. Some possible explanations may be volatilization (either into ambient air during sampling and analysis or directly through the sample bottle septa), microbial breakdown in the natural water, or chemical degradation. Additional analysis is currently being conducted to further characterize the mechanism of the observed loss.

ACKNOWLEDGMENTS

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REFERENCES

Agency for Toxic Substances and Disease Registry (ATSDR) (1993).

Toxicological Profile for Vinyl Chloride; Update. April, 1993.

Bradbury, S. P., Symonik, D. M., Coats, J. R., and Atchison, G. J.

- (1987). Toxicity of fenvalerate and its constituent isomers to the fathead minnow (*Pimephales promelas*) and bluegill (*Lepomis macrochirus*). Bull. Environ. Contam. Toxicol. 38, 378-385.
- Manshan, S. E. (1994). Environmental Chemistry, p. 133. Lewis Publishers, Ann Arbor, MI.
- Minnesota Department of Health (MDH) (1994). Proposed Permanent Rules Relating to Health Risk Limits. MN Rules 4717.7200. July 14, 1994.
- Minnesota Pollution Control Agency (MPCA) (1986). Procedure for Groundwater Monitoring, MPCA Guidelines. December, 1986.
- U.S. Environmental Protection Agency (USEPA) (1986). Emission Standards for Vinyl Chloride Plants, U.S. Environmental Protection Agency, Code of Federal Regulations 40 CFR 61.63.
- U.S. Environmental Protection Agency (USEPA) (1988). Laboratory Data Validation; Functional Guidelines for Evaluating Organics Analyses. U.S. Environmental Protection Agency, Hazardous Site Evaluation Division. February, 1988.
- U.S. Environmental Protection Agency (USEPA) (1989). Method 502.2. Version 2.0. EPA/600/4-88/039.
- U.S. Environmental Protection Agency (USEPA) (1993). Drinking Water Regulations and Health Advisories. U.S. Environmental Protection Agency, Office of Water. May, 1993.
- U.S. Environmental Protection Agency (USEPA) (1994). Health Effect Assessment Summary Tables (HEAST). EPA 540-R-94-020. March, 1994.

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Thanks to MN for their fine work.

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To: Hutchins; David; Joe, Donald; Skowronski, Edward; Godfrey, Gail; Hayes,
Lisa; West, Maurice; Gillig, Rick; Canady, Richard; Kauffman, Richard;
Williams-Fleetwood, Sharon; Rodenbeck, Sven; Forrester, Tina; Greim, Bill;
Cooper, Burt; Jackson, Diane; Campbell, Gary; Allred, Michael; Howie, Monty;
Ford, Rita; Isaacs, Sandy G. (ATSDR)
Cc: Reyes, Juan; Williams, Bob
Subject: Vinyl Chloride in Water -- Interim Guidance for screening
Date: Monday, December 02, 1996 10:07AM
Priority: Righ

A recent synopsis of a Minnesota study that appeared in Hazardous Substances & Public Health (vol 6, #3, Fall 1996) indicates that water samples tend to loose vinyl chloride with increasing holding time. According to the article, approximately 40% can be lost if a 14-day holding time is used and up to 25% may be lost of held for 2 days before the sample is analyzed. These losses seem to be most significant at low ppb range, around the MCL of 2 ug/1 (ppb).

Because of these losses, I suggest that health assessors, for screening purposes, DOUBLE any concentrations of vinyl chloride ranging between 1 and 50 ug/l as a first step in their overall analysis of drinking water (and possibly soil gas and indoor exposures). If the doubled value exceeds a relevant comparison value, the health assessor should then examine carefully the QA/QC procedures including length of time the samples were held, concordnce of any duplicate samples that may have been taken, etc.

As always, assessment of public health implications must go beyond simple comparisons to levels in a medium or media. However, it is important for the health assessor, the communities, ATSDR's partners (EPA, etc), to know that ATSDR is aware of the possibility that some loss of contaminat has been accounted for in the overall analysis.

Please feel free to comment or to put forward additional suggestions.

as

iolding times for VOC water samples scientific basis for revising regulatory



By O.R. Wesl, D.W. Bottrell, C.K. Bayne, R.L. Stegrist, and W.H. Holden

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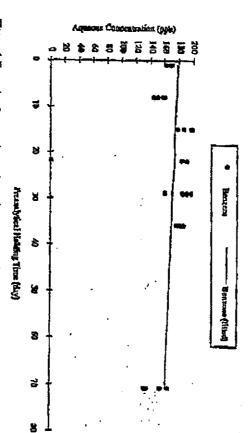
ompound (VOC) analysis, since some wels in covironmental samples. This s particularly true for volatile organic scurate quantification of contamerant t there target emplytes can volatilize Alytical storage is essential to the

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> samples to 28 days. for properly preserved VOC water to extend the maximum holding time cuts studies, as well as to provide reguperiods well over 14 days. The goal of this study was to confirm these previspace, 4 °C storage) are stable for time lutary agencies with the data necessary

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lainy Lauris, may back, and Alban streets for an astricti of Eucres Germaniours, MD 20874,

1.5.A. The author's would like to acknowledge

caps. Two hundred-fifty milligrams of sets of samples were prepared; one set stored at 4 °C prior to analysis. Two to filling. Each vial was completely NaHSO4 were placed in each vial prior cleaned 40-mL VOA vials with PTFIE filled (i.e., with no headspace) and lined (0,010-in,-thick) silicone septum into an appropriate number of pre-

purge-and-trap (PT) method, 'except (W2). At 1,8, 15, 22, 29, 35, and 71 second set was spiked to 200 ppb reagent water that had been acidified that all collibrations were performed in for VOCs. Analyses followed the samples from each set were analyzed days after sample preparation, four was apiked to 20 ppb (W1) while a

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stive change in concentration on the 28位位罗罗城公河路, have PACIA less than 28 days and the rel-< 10% of the initial valor, and VOCs that in concentration on the 28th day was days, but for which the science change have PKTs greater than 28 days (Group 1), VOCs that have PRIX less than 28 suldivided into three gampar-VOCs foot et al. " (Table 2). The compounds were lowing the method prescribed by Bayno each compound in each sample set fulporting times (PRIs) were calculated for dichloro-2-buttae (26%). Practical retetrachlomethene (16%), and trans-1,2trani-1,3-dichloropropene (12%), (42%), cis-1,3-dichloropropene (14%), carbon disulfide (17%), vinyl acctate nodinaromethme (15%), scrolein (25%) compounds in W2, including trichloexceeded 10% for a larger number of 2-burens (20%). Concentration changes properse (11%), and brave-1,4-dichlorovinyl acetate (42%), cit-1,3-dichloro lytes, concentration changes exceeded 10% for only three compounds in WI initial concentrations. Out of 44 and

cannot be addressed by restricting maxcan confound the analytical process and izam kolding times alone. eatst (e.g., inconsistent punging), which 2). However, additional analytical probterns for some of the latter compounds

not exclusivally defensible. missed, a practice that is very contry but ection of data if holding times are the correct practice of unequivocalityprocess by providing an alternative to study's results to data review would ment. Buthermore, application of this improve the enalytical data validation ries dirough simplified sample manages incorporation commencial laborates holding times can also increase the sumtivity). The suggested modification of for sample accepting (e.g., for radionecomplicated by additional requirements sult in logistical difficulties further of Pacagy. Stringent holding tipies to-Department of Defense and Department auce sampling programs such as the ment agencies with large-scale complilated community, particularly governfine extension would benefit the reguincasurement of YOCs, This holding water samples would aut jeopardize the day holding time for properly preserved This study demonstrated that a 28.

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*Colembed following Ref. 2. Setto 71 days for compounds with montiguident slopes

Further experimental details are given in West et al.

to pH ~2 with respent-grade NaHSO,

each compound within each sample sel relative measurement error [%RME]) for was established as follows: pounds). Measurement variability (i.e., parameters for a select number of com-(a.g., Figure 1; see Table 1 for regression for concentration versus analysis day Regression lines were fated to the data

$$\frac{S_0 \times 100\%}{C_0}$$
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ues for HALME were predominantly less concentration on Day 0, Calculated valsquare error for the linear regression residuals, and Co is the extrapolated where So is the square root of the meanthem 15% in both W1 and W2, with val-

> concentration change with time was served in vinyl accests in both W/I and large enough to offset the masking of-(21 and 29%). For this compound, the W2, despite a relatively large %RMH cally significant negative slope was obmunent variability. However, a statistiin vinyl chloride concentration with 33%). Statistically insignificant change SERME in both sample sets (43 and concentration trends with time were less locks of data scaller, time may have been due to large messchloride, which exhibited the highest ity. Such mosking of concentration ues being lower in W1 (20 ppb spike) trends may have occurred with vinyl the data was generally minimal, and that These law values indicate that scatter in ikely masked by measurement variabil

were predominantly low relative to the days of storage (fast culumn in Table 1) Changes in concentration after 28

CHARACTER OF THE CANADA ways, and extrapolation of laboratory centrations, use of simplified transport cally used. Examples of these uncertoxicity data from animals to humans. models to approximate exposure pathtemporal validity of containment containty acurees included spatial and this study. This criterion is reasonable ment for which analytical data are typiin site characterization and risk assess given the other sources of uncertainty holding time effects on compounds in change of 10% was chosen to assess quantitative risk assessments can be example, acceptable concentration mented with practical definitions of acinitial concentration = -10%). In such the Imput amplytical data. An acceptable changes for analytical data used in eventual use of the analytical data. For tration changes should be tied into the specifications for acceptable concenocptable concentration change, Ideally, time approach, must be complechange, such as the practical report measurement validity. Statistical defirisk assessment results to variations in sessing the effects of holding times on determined by the sensitivity of the uitions of significant concentration PRIs should be considered when as

for a few malytes (see Group 3 in Table Larger changes in concentration fected by sample storage for 28 days. proserved water samples will not be ef-36 of 44 purgeable VOCs in properly study showed that the measurement of for low-variability analytes, the stability ceptable concentration change of 10% (>10%) and low PRI's were observed Based on calculated PRII and an ao

SRMH = 5.0%, PRI = 9.4 days per - Hills of Figure Back Very USIY 500 not technically descensible "
This sindy also demonstrated a which, depending on the compounds of site-specific maximum holding times, study and practical reporting time smalmethodology for conducting a stability proach would be useful for establishing interest, can be longer than 28 days. ysis of the stability data. The latter ap-

cent change on the 28th day relative to

References

- Fed Reg Dec. 3., 1979. 40 CFR Part 136. Projected toler, vol. 44, no. 233/69594.
- Fed Reg Oct, 26,. 1984, 40 CFR Part 136. Rules and regulations, vol. 49, no. 209:145.
- U.S. EPA. U.S. EPA Contract Laboratory Solid Washe and Emergency Response, Program Functional Guidelines for Organis Data Review, EPA-540/R-94072, Office of Anchington, DC, 1994
- Bottroll DW. Suggested medification of pro-Society and U.S. 2004, 1995:507-16. Asacranso Symposium, American Chewica Hoventh Annual Waste Testing and Quality in water sumples. Proceedings of onelytical holding since—realette organics
- Musksriose MR, Bayco CK, Johnson LH . Voletile organics in covironmental water Hollsday SK, Jenkins RA, Stability of ormony, Oak Ridge, IN, 1989. camples: storage and preservation ORNETM-11300. Oak Ridge National Lab-
- Bottell DW, Fisk JE, Dampacy C. Promaty: Proceedings of the 198th Annual Symposium on Solid Waste Thathey and Quality Assurance, U.S. ETA II 1989:24. ical holding time study—yolaliks in water
- U.S. HPA. Ther Methods for Brailmating Solid Wants, 3rd cd.; SW-846, U.S. BPA Washington, DC, 1986 (Method 5260-A, rev
- West OR, Beyne CK, Hodden WE, Slogish EL, Scarbosouph SS, Betwell DW, Subility commercial laboratory, ORNL/TM-13240 pro-conflytical healting, part L Austyses by a of prograble VOCs in writer camples during Oak Ricks Netional Leboratory, Oak Ridge,
- Beyne CK, Schmoyer DD, Jenkins RA, Procphs. Kar Sch. Techned 1994; 22:1430-6. 🏟 tical reporting times for anyingmental sum-

R≖97%